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ORS-1

MCNAIR LAW FIRM, P.A.  
ATTORNEYS AND COUNSELORS AT LAW

www.mcnair.net

BANK OF AMERICA TOWER  
1301 GERVAIS STREET, 17th FLOOR  
COLUMBIA, SOUTH CAROLINA 29201

POST OFFICE BOX 11390  
COLUMBIA, SOUTH CAROLINA 29211  
TELEPHONE (803)799-9800  
FACSIMILE (803)376-2277

February 22, 2005

**VIA HAND DELIVERY**

Mr. Charles L. A. Terreni  
Chief Clerk/Administrator  
South Carolina Public Service Commission  
Synergy Business Park, The Saluda Building  
101 Executive Center Drive  
Columbia, South Carolina 29210

PROCEIVED  
2005 FEB 22 PM 3:40  
SOUTH CAROLINA  
PUBLIC SERVICE  
COMMISSION

**Re: Generic Proceeding Established Pursuant to Commission Order  
No. 2004-466 to Address the Appropriate Rate Classification or  
Rate Structure for Telephone Lines Located in Elevators and for  
Telephone Lines Located in Proximity to Swimming Pools  
Docket No. 2005-15-C**

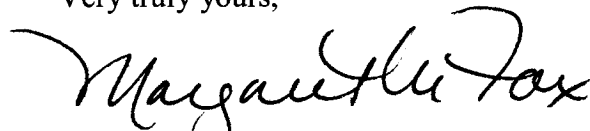
Dear Mr. Terreni:

Enclosed for filing on behalf of the South Carolina Telephone Coalition, please find an original and ten (10) copies of a Petition to Intervene in the above-captioned matter. By copy of this letter and Certificate of Service, all parties of record are being served with a copy of this Petition via U. S. Mail.

Please clock in a copy and return it with our courier.

Thank you for your assistance.

Very truly yours,

  
Margaret M. Fox

MMF/rwm  
Enclosures

cc: Parties of Record

**INTERVENOR**

#2-4/305 10:30

172824

**ACCEPTED**  
Legal 2062-23-05

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF  
SOUTH CAROLINA

Docket No. 2005-15-C

RECEIVED  
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SOUTH CAROLINA  
PUBLIC SERVICE  
COMMISSION

IN RE: Generic Proceeding Established Pursuant to )  
Commission Order No. 2004-466 to Address )  
the Appropriate Rate Classification or Rate )  
Structure for Telephone Lines Located in )  
Elevators and for Telephone Lines Located )  
in Proximity to Swimming Pools )

**PETITION  
TO INTERVENE**

The South Carolina Telephone Coalition ("SCTC") respectfully submits the within Petition to Intervene in the above-referenced docket. In support of its Petition, SCTC would respectfully show unto this honorable Commission:

1. SCTC is a coalition of incumbent local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission. A list of companies on whose behalf the SCTC is intervening in this matter is attached hereto as "Exhibit A."

2. This docket was established to address the appropriate rate classification or rate structure for telephone lines located in elevators and for telephone lines located in proximity to swimming pools. SCTC member companies and other telephone companies in South Carolina provide such telephone lines to customers.

3. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record in so far as its interests might appear.

RETURN DATE: OK  
SERVICE: OK

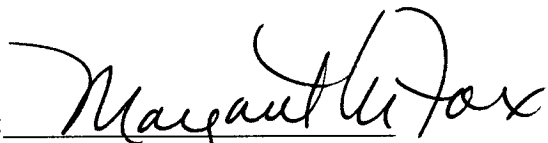
4. SCTC has not yet fully developed a position with respect to this proceeding.

However, as local exchange carriers providing the services that are the subject of this generic proceeding, SCTC member companies have a direct and substantial interest in this proceeding and will be directly affected by its outcome. Furthermore, the Commission has stated it would like to receive relevant information concerning telephone lines located in elevators and in proximity to swimming pools. Because SCTC member companies provide such telephone lines to customers, SCTC member companies are able to provide relevant information to the Commission regarding these services.

5. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

By: 

M. John Bowen, Jr.  
Margaret M. Fox  
McNair Law Firm, P.A.  
Post Office Box 11390  
Columbia, South Carolina 29211  
Telephone: (803) 799-9800  
Facsimile: (803) 753-3219  
Email: jbowen@mcnair.net;  
pfox@mcnair.net

ATTORNEYS FOR THE SOUTH  
CAROLINA TELEPHONE COALITION

Columbia, South Carolina  
February 22, 2005

## **EXHIBIT A**

### **South Carolina Telephone Coalition Member Companies**

Bluffton Telephone Company, Inc.  
Chesnee Telephone Company  
Chester Telephone Company  
Farmers Telephone Cooperative, Inc.  
Ft. Mill Telephone Company, d/b/a Comporium Communications, Inc.  
Hargray Telephone Company, Inc.  
Home Telephone Company, Inc.  
Horry Telephone Cooperative, Inc.  
Lancaster Telephone Company, d/b/a Comporium Communications, Inc.  
Lockhart Telephone Company  
McClellanville Telephone Company  
Norway Telephone Company  
Palmetto Rural Telephone Cooperative, Inc.  
Piedmont Rural Telephone Cooperative, Inc.  
PBT Telecom, Inc.  
Ridgeway Telephone Company  
Rock Hill Telephone Company, d/b/a Comporium Communications, Inc.  
Sandhill Telephone Cooperative, Inc.  
St. Stephen Telephone Company  
West Carolina Rural Telephone Cooperative, Inc.  
Williston Telephone Company

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF  
SOUTH CAROLINA

Docket No. 2005-15-C

RECEIVED  
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PUBLIC SERVICE  
COMMISSION

IN RE: Generic Proceeding Established Pursuant to )  
Commission Order No. 2004-466 to Address )  
the Appropriate Rate Classification or Rate )  
Structure for Telephone Lines Located in )  
Elevators and for Telephone Lines Located )  
in Proximity to Swimming Pools )  
\_\_\_\_\_ )

**CERTIFICATE  
OF SERVICE**

I, Rebecca W. Martin, Secretary for McNair Law Firm, P. A., do hereby certify that I have this date served one (1) copy of the attached Petition to Intervene in the above-referenced matter on the following parties of record by causing said copy to be deposited with the United States Mail, first class postage prepaid, affixed thereto and addressed as follows:

John F. Beach, Esquire  
Ellis, Lawhorne & Sims, P. A.  
Post Office Box 2285  
Columbia, South Carolina 29202

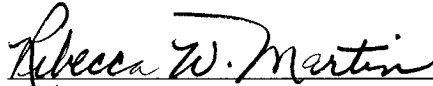
Stan Bugner  
Verizon South, Inc.  
1301 Gervais Street  
Suite 825  
Columbia, South Carolina 29201

Rufus S. Watson, Jr.  
4700 Touchey Drive #7  
Myrtle Beach, South Carolina 29579

Steven W. Hamm, Esquire  
Richardson, Plowden, Carpenter &  
Robinson, P. A.  
Post Office Box 7788  
Columbia, South Carolina 29202

Scott Elliott, Esquire  
Elliott & Elliott, P. A.  
721 Olive Street  
Columbia, South Carolina 29205

Florence P. Belser, Esquire  
Office of Regulatory Staff  
Post Office Box 11263  
Columbia, South Carolina 29211

  
\_\_\_\_\_  
Rebecca W. Martin  
McNair Law Firm, P.A.  
Post Office Box 11390  
Columbia, South Carolina  
(803) 799-9800

February 22, 2005

Columbia, South Carolina